



**LORING AFB
MAINE**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 1109



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

BY FACSIMILE AND FIRST CLASS MAIL

12 SEP RECD

Mr. Peter Forbes
42 CES/CEVR
7300 Pennsylvania Road
Loring Air Force Base, Maine 04751-5000

**Re: OU2 Proposed Plan Review (Landfills 2 and 3), Loring Air
Force Base, Limestone, Maine**

Dear Mr. Forbes:

The United States Environmental Protection Agency (EPA) has reviewed the Proposed Plan for the second operable unit (OU2) at Loring Air Force Base (LAFB). Although EPA has previously provided comments on a number of issues to the Air Force, there are several issues in the Proposed Plan which require further clarification in the Record of Decision (ROD) for OU2. These issues are discussed below.

(1) The OU 2 Proposed Plan referred to the OU2 ROD as an interim ROD. More accurately, however, the remedy for this operable unit at the site is intended to be a permanent remedy for source control. In particular, the selected remedy addresses remediation of the source of contamination at OU 2 by eliminating or reducing the risks posed by the presence of Landfill 2 (LF2) and Landfill 3 (LF3). This action will be followed by a management of migration remedial action at OU4 at a later date. Thus, because this action is intended to be the permanent source control remedy for OU 2, the OU2 ROD should be characterized as the final, rather than an interim, Record of Decision.

(2) The Proposed Plan discusses passive gas venting and states that the remedial action will meet state and federal applicable or relevant and appropriate requirements (ARARs) listed in the OU2 Remedial Investigation/Focused Feasibility Study (RI/FFS). The Proposed Plan does not, however, clarify the way in which this objective will be accomplished for air ARARs. In accordance with 40 C.F.R. § 300.430(f)(5)(iii)(D), the Air Force must include a discussion in the OU2 ROD concerning monitoring and testing of landfill gases after completion of the landfill caps and installation of landfill vents. The ROD must further provide that, after the relevant data is compiled, the Air Force will perform a landfill gas evaluation against established criteria and a risk assessment for submission to EPA to determine whether the concentrations of contaminants in air emissions and ambient air on- and off-site create an



unacceptable risk of exposure or threaten human health and the environment. Only after submission of the landfill gas evaluation and the risk assessment can a determination be made whether the vented landfill gases require treatment.

(3) Although the Proposed Plan states that the remedial action will meet state and federal ARARs listed in the OU2 RI/FFS, it does not clarify how this objective will be accomplished for wetlands. In accordance with 40 C.F.R. § 300.430(f)(5)(iii)(D), the need for an assessment of adjacent wetlands should be discussed in the OU2 ROD. In particular, the OU2 ROD should note that as part of IRP activities at LAFB, wetland areas located on the base which potentially could be impacted by basewide remedial efforts are being evaluated as part of OU 13. This evaluation will include an assessment of the approach and location for restoring/replacing wetlands affected by remedial activities. Moreover, the ROD should state that if adjacent wetlands are lost through the OU 2 source control remedial action, they will be replaced with wetlands equal to or greater than the size and value of the affected wetlands.

Should you have any questions on the above, feel free to contact me at (617) 223-5503.

Sincerely,



Michael Nalipinski
Remedial Project Manager
Federal Facilities Superfund Section

cc: Naji Akladiss, ME DEP
Mary Sanderson, EPA
Robert DiBiccaro, EPA ORC
LeAnn Walls, EPA ORC

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